

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:

iMedia Brands, Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10852 (KBO)

(Jointly Administered)

Re: Docket No. 324

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON AUGUST 2, 2023 AT 1:00 P.M. (EASTERN TIME)³**

This hearing will be conducted in person. All parties, including witnesses, are expected to attend in person unless permitted to appear via Zoom. Participation at the in-person court proceeding using Zoom is allowed only in the following circumstances: (i) counsel for a party or a pro se litigant files a responsive pleading and intends to make only a limited argument; (ii) a party or a representative of a party is interested in observing the hearing; (iii) a party is proceeding in a claims allowance dispute on a pro se basis; (iv) an individual has a good faith health-related reason to participate remotely and has obtained permission from chambers to do so; or (v) other extenuating circumstances that warrant remote participation as may be determined by the Court.⁴

If appearance via Zoom is permitted, please use the following link to register for this hearing to appear via Zoom. All individuals participating by video must register at least two (2) hours prior to the hearing. After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); iMedia Brands, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors' service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

² **Amended items are in bold.**

³ This agenda contains hyperlinks to filed documents pursuant to the Court's Interim Order re: Cessation of Hand Deliveries, dated March 13, 2020. Parties may access the filed documents through the hyperlink for a fee through the Court's website at www.deb.uscourts.gov, or the documents may be obtained for free by accessing the Debtors' restructuring website at <https://cases.stretto.com/mediabrand/>.

⁴ See Chambers Procedures of the Honorable Karen B. Owens dated October 3, 2022.
<https://www.deb.uscourts.gov/content/judge-karen-b-owens>.

https://debuscourts.zoomgov.com/meeting/register/vJIsdemhqzwoGurI9HMCvYIDw_ZPjlg-GqY

Topic: iMedia Brands, Inc., et al. – Case No. 23-10852 (KBO)

When: August 2, 2023 at 1:00 p.m. (Prevailing Eastern Time)

**You must use your full name when registering and logging into
Zoom or you will not be granted access to the hearing.
CourtCall will NOT be used for this hearing.**

MATTERS GOING FORWARD

1. **Cash Management Motion** – Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 6/29/23] ([Docket No. 8](#)).

Response Deadline: July 12, 2023 at 4:00 p.m. (Eastern Time). Extended to July 24, 2023 for the Trustee and the Committee.

Responses Received:

- a. Informal comments from PNC Bank, National Association.
- b. Informal comments from the Trustee.
- c. Omnibus Reservation of Rights of the Official Committee of Unsecured Creditors to Certain First Day Motions and Entry of Final Orders Granting the Same [Filed: 7/17/23] ([Docket No. 159](#)).

Related Documents:

- a. Certification of Counsel Submitting Revised Interim Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Perform Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 6/30/23] ([Docket No. 62](#)).
- b. [Signed] Interim Order (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Perform Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 6/30/23] ([Docket No. 67](#)).
- c. Notice of Entry of Interim Order and Final Hearing Regarding Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate

Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 7/3/23] ([Docket No. 76](#)).

- d. Declaration of James Alt in Support of Supplement to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 7/25/23] ([Docket No. 252](#)).
- e. Certification of Counsel Regarding Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Continue to Operate Their Cash Management System, (B) Honor Certain Prepetition Obligations Related Thereto, (C) Maintain Existing Business Forms, and (D) Continue Certain Intercompany Transactions, and (II) Granting Related Relief [Filed: 7/25/23] ([Docket No. 255](#)).

Status: This matter will go forward.

- 2. **Bid Procedures Motion** - Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief [Filed: 7/28/23] ([Docket No. 311](#))

Response Deadline: Responses may be filed any time at or before the hearing.

Responses Received:

- a. **Limited Objection of Kinbow, Inc. to Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief** [Filed 8/1/23] ([Docket No. 327](#)).

Related Documents:

- a. Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/3/23] ([Docket No. 93](#)).
- b. Debtors' Motion to Shorten Notice and Schedule Expedited Hearing on Bidding Procedures Motion [Filed: 7/28/23] ([Docket No. 312](#))
- c. [FILED UNDER SEAL] Declaration of James Alt in Support of (A) Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief and (B) Motion to Shorten Notice With Respect Thereto [Filed: 7/31/23] (Docket No. 315)

- d. [REDACTED] Declaration of James Alt in Support of (A) Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief and (B) Motion to Shorten Notice With Respect Thereto [Filed: 7/31/23] ([Docket No. 316](#))
- e. [FILED UNDER SEAL] Declaration of Eugene Lee in Support of (A) Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief and (B) Motion to Shorten Notice With Respect Thereto [Filed: 7/31/23] (Docket No. 319)
- f. [REDACTED] Declaration of Eugene Lee in Support of (A) Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief and (B) Motion to Shorten Notice With Respect Thereto [Filed: 7/31/23] ([Docket No. 320](#))
- g. [Signed] Order Granting Debtors' Motion to Shorten Notice and Schedule Expedited Hearing on Bid Procedures Motion [Filed: 7/31/23] ([Docket No. 322](#))
- h. Notice of Hearing on Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief [Filed: 7/31/23] ([Docket No. 323](#))
- i. **Declaration of Eugene Lee in Support of the Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/4/23] ([Docket No. 94](#))**
- j. **Supplemental Declaration of Eugene Lee in Support of the Debtors' Motion Pursuant to Sections 105, 363, and 365 of the Bankruptcy Code for Entry of an Order (I) Authorizing the Sale of Substantially All of the Debtors' Assets Free and Clear of All Encumbrances Other Than Assumed Liabilities; (II) Approving the Debtors' Entry Into the Asset Purchase Agreement; (III) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (IV) Granting Related Relief [Filed: 7/24/23] ([Docket No. 243](#))**
- k. **Supplemental Declaration of James Alt in Support of Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief [Filed: 8/1/23] ([Docket No. 326](#))**

Status: This matter is going forward. **The U.S. Trustee has provided consent to a revised version of an order approving the motion that the Debtors intend to file in advance of the hearing.**

3. **Seal Motion** - Debtors' Motion for Entry of an Order Authorizing Debtors to Redact and File Under Seal Portions of the Bid Procedures Declarations [Filed: 7/31/23] ([Docket No. 321](#))

Response Deadline: Responses may be filed any time at or before the hearing.

Related Documents:

- a. [FILED UNDER SEAL] Declaration of James Alt in Support of (A) Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief and (B) Motion to Shorten Notice With Respect Thereto [Filed: 7/31/23] (Docket No. 315)
- b. [REDACTED] Declaration of James Alt in Support of (A) Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief and (B) Motion to Shorten Notice With Respect Thereto [Filed: 7/31/23] ([Docket No. 316](#))
- c. [FILED UNDER SEAL] Declaration of Eugene Lee in Support of (A) Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief and (B) Motion to Shorten Notice With Respect Thereto [Filed: 7/31/23] (Docket No. 319)
- d. [REDACTED] Declaration of Eugene Lee in Support of (A) Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures, the Form and Manner of Notice Thereof and (II) Granting Related Relief and (B) Motion to Shorten Notice With Respect Thereto [Filed: 7/31/23] ([Docket No. 320](#))

Status: This matter will go forward.

Dated: **August 1, 2023**
Wilmington, Delaware

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Timothy P. Cairns

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899-8705 (Courier 19801)
Telephone: 302-652-4100
Facsimile: 302-652-4400
E-mail: ljones@pszjlaw.com
tcairns@pszjlaw.com

-and-

ROPES & GRAY LLP

Ryan Preston Dahl (admitted *pro hac vice*)
Cristine Pirro Schwarzman (admitted *pro hac vice*)
1211 Avenue of the Americas
New York, New York 10036
Telephone: (212) 596-9000
Facsimile: (212) 596-9090
E-mail: ryan.dahl@ropesgray.com
cristine.schwarzman@ropesgray.com

-and-

ROPES & GRAY LLP

Stephen L. Iacovo (admitted *pro hac vice*)
191 North Wacker Drive, 32nd Floor
Chicago, Illinois 60606
Telephone: (312) 845-1200
Facsimile: (212) 845-5500
E-mail: stephen.iacovo@ropesgray.com

Proposed Counsel to the Debtors and Debtors in Possession